

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF TEXAS

SAN ANTONIO DIVISION

UNITED STATES OF AMERICA

VS

CARLOS BACA

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NO. SA:15-CR-00270-(2)-FB

MOTION TO TERMINATE PROBATION

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW CARLOS BACA, Defendant in the above entitled and numbered cause, by and through his undersigned counsel and move the Court for early termination of the probation imposed in the above entitled and numbered cause pursuant to Title 18 U.S.C. § 371 and in support thereof would show unto the court as follows:

I.

The Defendant was charged with the offense of conspiracy to defraud the United States. Defendant plead guilty on June 18, 2015. On March 11, 2016, the Defendant was sentenced to five (5) years of probation.

II.

The Defendant has completed thirty-five (35) months of his probation. Additionally, the Defendant has had no violations of any kind and is currently in compliance with all the terms and conditions of his sentence.

III.

The Defendant has paid the special assessment and completed the payments on the restitution ordered.

IV.

The probation and restitution payments paid by this Defendant have had strong rehabilitative effects. Defendant has made positive changes in his life. Mr. Baca is keenly aware of the negative impact and consequences of his past actions and assures the Court that he will never again participate in unlawful activity of any kind.

V.

US Probation Officer Virginia Silva has informed counsel that she does not oppose the granting of this Motion.

WHEREFORE, PREMISES CONSIDERED, the Defendant respectfully prays that the Court grant this motion.

Respectfully Submitted,

LAW OFFICES OF ALAN BROWN
222 MAIN PLAZA
SAN ANTONIO, TX 78205
210-227-5103 (P)
210-225-2481 (F)

/S/

ALAN BROWN
BAR NO. 03090000

CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of February, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

U.S. Attorney's Office
601 NW Loop 410, Suite 600
San Antonio, Texas 78216

_____/S/
ALAN BROWN

UNITED STATES DISTRICT COURT
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ORDER

On this date came to be considered Defendant's Motion to Terminate Probation. After consideration of same, the Court is of this opinion that said Motion is hereby

GRANTED DENIED

IT IS HEREBY FURTHER ORDERED THAT:_____

_____.

SIGNED and ENTERED on this the _____ day of _____, 2019.

U.S. DISTRICT JUDGE